

# **EXHIBIT A**



Benjamin W. Hulse  
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E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

February 08, 2018

**VIA EMAIL AND U.S. MAIL**

David W. Hodges  
Kennedy Hodges, L.L.P.  
4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Koors v. 3M Company et al Case No.: 0:17-cv-02524-JNE-FLN*

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Koors\_Audrey\_17-cv-2524\_1\_Koors\_Audrey\_17-cv-2524\_1"

Koors\_Audrey\_17-cv-  
2524\_1\_Koors\_Audrey\_17-cv-2524\_1

PLAINTIFFS' LAST NAME - Koors

PLAINTIFFS' FIRST NAME - Audrey

CASE NO. - 0:17-cv-02524

SECTION I (CASE INFORMATION) -

SECTION II (PERSONAL INFORMATION) - Incomplete

SECTION II - INCOMPLETE QUESTIONS - 02, 08, 09, 10, 11, 12, 13

SECTION III (SURGERY INFORMATION) -

SECTION IV - 1 (VITAL STATISTICS) - Incomplete

SECTION IV - 10 (DRUG/ALCOHOL) -

SECTION IV - 3 (HEALTHCARE PROVIDERS) -

SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete

SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete

SECTION IV - 9 (TOBACCO) -

SECTION IX - 1 (CONSORTIUM NAME ETC.) -

SECTION IX - 3 (RESIDENCES) -

SECTION IX - 4 (MARRIED) -

SECTION V - 5 (DISABILITY CLAIMS) - Incomplete

SECTION V - 6 (LAWSUITS) -

SECTION V - 7 (BANKRUPTCY) -

SECTION VI - 1 (PHYSICAL INJURY) - Incomplete

SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete

SECTION VI - 6 (WARNINGS) -

SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -

SECTION VI - 8 (3M/ARIZANT WARRANTY) -

SECTION VI - 9 (AUGUSTINE) -

SECTION VII - 1 (LOST PAST WAGES) -

SECTION VII - 2 (LOST FUTURE WAGES) -

SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -

X.01 - SIGNED AUTHORIZATION -

X.02.D - DOCUMENTS - SIGNED VERIFICATION -

I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges, L.L.P.

I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



Benjamin W. Hulse  
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December 29, 2017

**VIA EMAIL AND U.S. MAIL**

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*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Jenkins obo Gwendolyn Jensen v. 3M Company et al Case No.: 0:17-cv-03014-*  
JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Title "Jensen\_Gwendolyn\_17-cv-3014\_1\_Jensen\_Gwendolyn\_17-cv-3014\_1"

Jensen\_Gwendolyn  
\_17-cv-  
3014\_1\_Jensen\_Gwen  
dolyn\_17-cv-3014\_1

PLAINTIFFS' LAST NAME - Jensen  
PLAINTIFFS' FIRST NAME - Gwendolyn  
CASE NO. - 17-cv-3014  
SECTION I (CASE INFORMATION) - Incomplete  
SECTION I - INCOMPLETE QUESTIONS - 04  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 08, 09, 10, 11, 12, 13, 14, 15, 16  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 03  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) -  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges, L.L.P.  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



February 14, 2018

Benjamin W. Hulse  
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**VIA EMAIL AND U.S. MAIL**

Seth Webb  
Brown and Crouppen, P.C.  
211 N. Broadway, Suite 1600  
St. Louis, MO 63102  
[sethw@getbc.com](mailto:sethw@getbc.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
Hoyos v. 3M Company et al Case No.:0:17-cv-03022-JNE-FLN*

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Hoyos\_Teresa\_017-cv-3022\_1\_Hoyos\_Teresa\_017-cv-3022\_1"

Hoyos\_Teresa\_017-cv-  
3022\_1\_Hoyos\_Teresa  
\_017-cv-3022\_1

PLAINTIFFS' LAST NAME - Hoyos  
PLAINTIFFS' FIRST NAME - Teresa L.  
CASE NO. - 0:17-cv-3022  
SECTION I (CASE INFORMATION) - Incomplete  
SECTION I - INCOMPLETE QUESTIONS - 01, 04  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 01, 02, 03, 04, 05  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Brown & Crouppen  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - sethw@getbc.com



Benjamin W. Hulse  
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April 5, 2018

**VIA EMAIL AND U.S. MAIL**

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Kennedy Hodges, LLP  
4409 Montrose Blvd, Ste 200  
Houston, TX 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Witt, Alan. v. 3M Company et al Case No.:0:17-cv-03464-JNE-FLN*

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Witt\_Alan\_17-cv-3464\_1\_Witt\_Alan\_17-cv-3464\_1"

Witt\_Alan\_17-cv-  
3464\_1\_Witt\_Alan\_17-  
cv-3464\_1

PLAINTIFFS' LAST NAME - Witt

PLAINTIFFS' FIRST NAME - Alan

CASE NO. - 17-cv-3464

SECTION I (CASE INFORMATION) -

SECTION II (PERSONAL INFORMATION) - Incomplete

SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16

SECTION III (SURGERY INFORMATION) - Incomplete

SECTION III - INCOMPLETE QUESTIONS - 03

SECTION IV - 1 (VITAL STATISTICS) - Incomplete

SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete

SECTION IV - 3 (HEALTHCARE PROVIDERS) -

SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete

SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete

SECTION IV - 9 (TOBACCO) - Incomplete

SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete

SECTION IX - 3 (RESIDENCES) - Incomplete

SECTION IX - 4 (MARRIED) - Incomplete

SECTION V - 5 (DISABILITY CLAIMS) - Incomplete

SECTION V - 6 (LAWSUITS) - Incomplete

SECTION V - 7 (BANKRUPTCY) - Incomplete

SECTION VI - 1 (PHYSICAL INJURY) - Incomplete

SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete

SECTION VI - 6 (WARNINGS) - Incomplete

SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete

SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete

SECTION VI - 9 (AUGUSTINE) - Incomplete

SECTION VII - 1 (LOST PAST WAGES) - Incomplete

SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete

SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete

X.01 - SIGNED AUTHORIZATION - Incomplete

X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete

I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges

I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



Benjamin W. Hulse  
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E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

February 22, 2018

**VIA EMAIL AND U.S. MAIL**

Rolf T. Fiebiger  
Johnson Becker, PLLC  
444 Cedar St., Suite 1800  
St. Paul, MN 55101  
[rfiebiger@johnsonbecker.com](mailto:rifiebiger@johnsonbecker.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Hoerbert, Darlene v. 3M Company et al Case No.: 0:17-cv-03616-JNE-FLN*

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Hoerbert\_Darlene\_017-cv-03616\_1\_Hoerbert\_Darlene\_017-cv-03616\_1"

Hoerbert\_Darlene\_017  
-cv-  
03616\_1\_Hoerbert\_Dar  
lene\_017-cv-03616\_1

PLAINTIFFS' LAST NAME - Hoerbert

PLAINTIFFS' FIRST NAME - Darlene

CASE NO. - 0:17-cv-03616

SECTION I (CASE INFORMATION) -

SECTION II (PERSONAL INFORMATION) -

SECTION III (SURGERY INFORMATION) -

SECTION IV - 1 (VITAL STATISTICS) -

SECTION IV - 10 (DRUG/ALCOHOL) -

SECTION IV - 3 (HEALTHCARE PROVIDERS) -

SECTION IV - 7 (PHARMACIES/DRUGSTORES) -

SECTION IV - 8 (DENTAL PROCEDURES) -

SECTION IV - 9 (TOBACCO) -

SECTION IX - 1 (CONSORTIUM NAME ETC.) -

SECTION IX - 3 (RESIDENCES) -

SECTION IX - 4 (MARRIED) -

SECTION V - 5 (DISABILITY CLAIMS) -

SECTION V - 6 (LAWSUITS) -

SECTION V - 7 (BANKRUPTCY) -

SECTION VI - 1 (PHYSICAL INJURY) - Incomplete

SECTION VI - 3 (EMOTIONAL DISTRESS) -

SECTION VI - 6 (WARNINGS) -

SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -

SECTION VI - 8 (3M/ARIZANT WARRANTY) -

SECTION VI - 9 (AUGUSTINE) -

SECTION VII - 1 (LOST PAST WAGES) -

SECTION VII - 2 (LOST FUTURE WAGES) -

SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -

X.01 - SIGNED AUTHORIZATION -

X.02.D - DOCUMENTS - SIGNED VERIFICATION -

I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Johnson Becker

I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - rflebiger@johnsonbecker.com



Benjamin W. Hulse  
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E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

February 28, 2018

**VIA EMAIL AND U.S. MAIL**

Wesley G. Barr  
The Olinde Firm, LLC  
400 Poydras Street Suite 1980  
New Orleans, LA 70130  
[wbarr@olindefirm.com](mailto:wbarr@olindefirm.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
Pimentel, Carlos v. 3M Company et al Case No.: 0:17-cv-03899-JNE-FLN*

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Pimentel\_Carlos\_017-cv-03899\_1\_Pimentel\_Carlos\_017-cv-03899\_1"

Pimentel\_Carlos\_017-  
cv-  
03899\_1\_Pimentel\_Car  
los\_017-cv-03899\_1

PLAINTIFFS' LAST NAME - Pimentel  
PLAINTIFFS' FIRST NAME - Carlos  
CASE NO. - 0:17-cv-03899  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 06, 09  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
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SECTION V - 7 (BANKRUPTCY) -  
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SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION -  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - The Olinde Firm, LLC  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - wbarr@olindefirm.com



Benjamin W. Hulse  
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E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

April 2, 2018

**VIA EMAIL AND U.S. MAIL**

Wesley G. Barr  
The Olinde Firm, LLC  
400 Poydras Street Suite 1980  
New Orleans, LA 70130  
[wbarr@olindefirm.com](mailto:wbarr@olindefirm.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Hurley, Jonathan v. 3M Company et al Case No.:0:17-cv-04169-JNE-FLN*

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Hurley\_Jonathan\_17-cv-04169\_1\_Hurley\_Jonathan\_17-cv-04169\_1"

Hurley\_Jonathan\_17-  
cv-  
04169\_1\_Hurley\_Jonth  
an\_17-cv-04169\_1

PLAINTIFFS' LAST NAME - Hurley  
PLAINTIFFS' FIRST NAME - Jonathan C.  
CASE NO. - 17-cv-04169  
SECTION I (CASE INFORMATION) - Incomplete  
SECTION I - INCOMPLETE QUESTIONS - 04  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 10  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) -  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION -  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - The Olnde Firm, LLC  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - wbarr@ollndefirm.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

January 11, 2018

**VIA EMAIL AND U.S. MAIL**

Amanda M. Williams  
Gustafson Gluek PLLC  
120 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
[awilliams@gustafsongluek.com](mailto:awilliams@gustafsongluek.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Nickell et al v. 3M Company et al* Case No.: 0:17-cv-04285-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Enclosure

Title "Nickell\_Vernon\_17-cv-4285\_1\_Nickell\_Vernon\_17-cv-4285\_1"

PLAINTIFFS' LAST NAME - Nickell

PLAINTIFFS' FIRST NAME - Vernon

CASE NO. - 17-cv-04285

SECTION I (CASE INFORMATION) -

SECTION II (PERSONAL INFORMATION) - Incomplete

SECTION II - INCOMPLETE QUESTIONS - 03, 09

SECTION III (SURGERY INFORMATION) - Incomplete

SECTION III - INCOMPLETE QUESTIONS - 03

SECTION IV - 1 (VITAL STATISTICS) -

SECTION IV - 10 (DRUG/ALCOHOL) -

SECTION IV - 3 (HEALTHCARE PROVIDERS) -

SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete

SECTION IV - 8 (DENTAL PROCEDURES) -

SECTION IV - 9 (TOBACCO) - Incomplete

SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete

SECTION IX - 3 (RESIDENCES) -

SECTION IX - 4 (MARRIED) -

SECTION V - 5 (DISABILITY CLAIMS) -

SECTION V - 6 (LAWSUITS) -

SECTION V - 7 (BANKRUPTCY) -

SECTION VI - 1 (PHYSICAL INJURY) -

SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete

SECTION VI - 6 (WARNINGS) -

SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -

SECTION VI - 8 (3M/ARIZANT WARRANTY) -

SECTION VI - 9 (AUGUSTINE) -

SECTION VII - 1 (LOST PAST WAGES) -

SECTION VII - 2 (LOST FUTURE WAGES) -

SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete

X.01 - SIGNED AUTHORIZATION -

X.02.D - DOCUMENTS - SIGNED VERIFICATION -

I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Gustafson Gluek PLLC

I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - awilliams@gustafsongluek.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

April 2, 2018

**VIA EMAIL AND U.S. MAIL**

Amanda M Williams  
Gustafson Gluek PLLC  
120 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
[awilliams@gustafsongluek.com](mailto:awilliams@gustafsongluek.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
Adams, Artis v. 3M Company et al Case No.: 0:17-cv-04467-JNE-FLN*

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Title "Adams\_Artis\_17-cv-04467\_1\_Adams\_Artis\_17-cv-04467\_1"

Adams\_Artis\_17-cv-  
04467\_1\_Adams\_Artis  
\_17-cv-04467\_1

PLAINTIFFS' LAST NAME - Adams  
PLAINTIFFS' FIRST NAME - Artis  
CASE NO. - 17-cv-04467  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 06  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 01, 03  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) -  
SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION -  
X.02.D - DOCUMENTS - SIGNED VERIFICATION -  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Gustafson Gluek  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - awilliams@gustafsongluek.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

March 29, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel C. Burke  
Bernstein Liebhard LLP  
10 E. 40th Street  
New York, NY 10016  
[dburke@bernlieb.com](mailto:dburke@bernlieb.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
Holstine, Rachel v. 3M Company et al Case No.: 0:17-cv-04476-JNE-FLN*

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Title "Holstine \_Rachel \_017-cv-04476\_1\_Holstine \_Rachel \_017-cv-04476\_1"

Holstine \_Rachel  
\_017-cv-  
04476\_1\_Holstine  
\_Rachel \_017-cv-  
04476\_1

PLAINTIFFS' LAST NAME - Holstine

PLAINTIFFS' FIRST NAME - Rachel

CASE NO. - 0:17-cv-04476

SECTION I (CASE INFORMATION) -

SECTION II (PERSONAL INFORMATION) - Incomplete

SECTION II - INCOMPLETE QUESTIONS - 07

SECTION III (SURGERY INFORMATION) -

SECTION IV - 1 (VITAL STATISTICS) -

SECTION IV - 10 (DRUG/ALCOHOL) -

SECTION IV - 3 (HEALTHCARE PROVIDERS) -

SECTION IV - 7 (PHARMACIES/DRUGSTORES) -

SECTION IV - 8 (DENTAL PROCEDURES) -

SECTION IV - 9 (TOBACCO) -

SECTION IX - 1 (CONSORTIUM NAME ETC.) -

SECTION IX - 3 (RESIDENCES) -

SECTION IX - 4 (MARRIED) -

SECTION V - 5 (DISABILITY CLAIMS) -

SECTION V - 6 (LAWSUITS) -

SECTION V - 7 (BANKRUPTCY) -

SECTION VI - 1 (PHYSICAL INJURY) - Incomplete

SECTION VI - 3 (EMOTIONAL DISTRESS) -

SECTION VI - 6 (WARNINGS) -

SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -

SECTION VI - 8 (3M/ARIZANT WARRANTY) -

SECTION VI - 9 (AUGUSTINE) -

SECTION VII - 1 (LOST PAST WAGES) -

SECTION VII - 2 (LOST FUTURE WAGES) -

SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -

X.01 - SIGNED AUTHORIZATION -

X.02,D - DOCUMENTS - SIGNED VERIFICATION - Incomplete

I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Bernstein Liebhard

I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dburke@bernlieb.com, dlee@bernlieb.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

April 16, 2018

**VIA EMAIL AND U.S. MAIL**

David W. Hodges  
Kennedy Hodges, L.L.P.  
4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg.kennedyhodges.com](mailto:mtg.kennedyhodges.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Richey, Priscilla v. 3M Company et al* Case No.: 0:17-cv-05323-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Richey\_Priscilla\_17-cv-5323\_1\_Richey\_Priscilla\_17-cv-5323\_1"

Richey\_Priscilla\_17-  
cv-  
5323\_1\_Richey\_Priscill  
a\_17-cv-5323\_1

PLAINTIFFS' LAST NAME - Richey  
PLAINTIFFS' FIRST NAME - Priscilla  
CASE NO. - 17-cv-5323  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 03  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) -  
SECTION VI - 1.01 (PHYSICAL INJURY) - Yes  
SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com

# **EXHIBIT B**



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

February 26, 2018

VIA EMAIL AND U.S. MAIL

Seth Webb  
Brown and Crouppen, P.C.  
211 N. Broadway, Suite 1600  
St. Louis, MO 63102  
[sethw@getbc.com](mailto:sethw@getbc.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Brainerd, Jeremiah et al v. 3M Company et al* Case No.:0:17-cv-03305-JNE-  
FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Title "Brainerd\_Jeremiah \_017-cv-3305\_1\_Brainerd\_Jeremiah \_017-cv-3305\_1"

Brainerd\_Jeremiah  
\_017-cv-  
3305\_1\_Brainerd\_Jere  
miah \_017-cv-3305\_1

PLAINTIFFS' LAST NAME - Brainerd  
PLAINTIFFS' FIRST NAME - Jeremiah  
CASE NO. - 0:17-cv-3305  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 02, 07, 08, 11  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Brown & Crouppen  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - sethw@getbc.com



April 2, 2018

Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

**VIA EMAIL AND U.S. MAIL**

Seth Webb  
Brown and Crouppen, P.C.  
211 N. Broadway, Suite 1600  
St. Louis, MO 63102  
[sethw@getbc.com](mailto:sethw@getbc.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Gibson, Lisa Karen v. 3M Company et al Case No.:0:17-cv-04041-JNE-FLN*

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Gibson\_Lisa\_017-cv-4041\_1\_Gibson\_Lisa\_017-cv-4041\_1"

Gibson\_Lisa\_017-cv-  
4041\_1\_Gibson\_Lisa  
\_017-cv-4041\_1

PLAINTIFFS' LAST NAME - Gibson  
PLAINTIFFS' FIRST NAME - Lisa  
CASE NO. - 0:17-cv-4041  
SECTION I (CASE INFORMATION) - Incomplete  
SECTION I - INCOMPLETE QUESTIONS - 01, 04  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 01, 02, 03, 04, 05  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Brown & Crouppen  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - sethw@getbc.com

# **EXHIBIT C**

**From:** Ben Hulse  
**Sent:** Saturday, May 12, 2018 8:33 AM  
**To:** 'JoanEricksen\_Chambers@mnd.uscourts.gov' <[JoanEricksen\\_Chambers@mnd.uscourts.gov](mailto:JoanEricksen_Chambers@mnd.uscourts.gov)>;  
'Noel\_Chambers@mnd.uscourts.gov' <[Noel\\_Chambers@mnd.uscourts.gov](mailto:Noel_Chambers@mnd.uscourts.gov)>  
**Cc:** Jerry Blackwell <[blackwell@blackwellburke.com](mailto:blackwell@blackwellburke.com)>; Bridget Ahmann  
<[Bridget.Ahmann@FaegreBD.com](mailto:Bridget.Ahmann@FaegreBD.com)>; 'gzimmerman@meshbesher.com'  
<[gzimmerman@meshbesher.com](mailto:gzimmerman@meshbesher.com)>; 'bgordon@levinlaw.com' <[bgordon@levinlaw.com](mailto:bgordon@levinlaw.com)>;  
'MVC@ciresiconlin.com' <[MVC@ciresiconlin.com](mailto:MVC@ciresiconlin.com)>; 'JMC@CiresiConlin.com' <[JMC@CiresiConlin.com](mailto:JMC@CiresiConlin.com)>;  
'David J. Szerlag' <[david@pritzkerlaw.com](mailto:david@pritzkerlaw.com)>; 'Wendy Thayer' <[wendy@pritzkerlaw.com](mailto:wendy@pritzkerlaw.com)>  
**Subject:** Bair Hugger, MDL 2666 -- Defendants' lists of PFS disputes for May 2018

Dear Judge Erickson,

Even though this month's status conference has been cancelled, Defendants would still like to list cases with Plaintiff Fact Sheet disputes, as provided by PTO 14, paragraph 7, Dkt. No. 117.

In the past (including last month), the Court ordered that PFS disputes were deemed "addressed to the Court" notwithstanding the cancellation of the in-court conference. (E.g., Dkt. No. 959, 1222.) Defendants request the same for this month. Thank you for your consideration of this request.

Best regards,

Ben Hulse

Counsel for Defendants

Benjamin W. Hulse  
Blackwell Burke P.A.  
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Defendants' PFS List 1: Overdue Plaintiff Fact Sheets  
(Updated May 11, 2018)

| Case Number           | Title  | Date Filed | Due Date  | Prior Listing | Firm Name                                 |
|-----------------------|--|------------|-----------|---------------|---|
| 0:17-cv-05302-JNE-FLN | Kelley, Charles v. 3M Company et al          | 11/30/2017 | 2/28/2018 | 4/10/2018     | Kirtland & Packard LLP                    |
| 0:17-cv-05342-JNE-FLN | Bozeman, Lynda v. 3M Company et al           | 12/4/2017  | 3/4/2018  | 4/10/2018     | Kennedy Hodges,                           |
| 0:17-cv-05375-JNE-FLN | Lewis, Ronnie v. 3M Company et al            | 12/7/2017  | 3/7/2018  | 4/10/2018     | Davis & Crump, P.C.                       |
| 0:17-cv-05458-JNE-FLN | Lake, Herbert v. 3M Company et al            | 12/15/2017 | 3/15/2018 | 4/10/2018     | Kirtland & Packard LLP                    |
| 0:17-cv-05469-JNE-FLN | Minnigan-Judd, Stephanie v. 3M Company et al | 12/18/2017 | 3/18/2018 | 4/10/2018     | The Law offices of Travis R. Walker, P.A. |
| 0:17-cv-05515-JNE-FLN | Gates, Kathy v. 3M Company et al             | 12/20/2017 | 3/20/2018 | 4/10/2018     | Kirtland & Packard LLP                    |
| 0:17-cv-01489-JNE-FLN | Lawhon, Bobbie v. 3M Company et al.          | 5/5/2017   | 5/3/2018  |               | Hollis Legal Solutions, PLLC              |
| 0:17-cv-04872-JNE-FLN | Grimsley, Daniel v. 3M Company et al.        | 10/26/2017 | 1/24/2018 |               | Bernstein Liebhard LLP                    |
| 0:17-cv-05581-JNE-FLN | Berzesenyi, Robert v. 3M Company et al       | 12/29/2017 | 3/29/2018 |               | Law Offices of Charles H Johnson, PA      |
| 0:17-cv-05589-JNE-FLN | Bardwell, Doris v. 3M Company et al          | 12/29/2017 | 3/29/2018 |               | Law Offices of Charles H Johnson, PA      |
| 0:18-cv-00071-JNE-FLN | Mayfield, Antoine v. 3M Company et al        | 1/10/2018  | 4/10/2018 |               | Davis & Crump, P.C.                       |
| 0:18-cv-00076-JNE-FLN | Kurbis, Melanie v. 3M Company et al          | 1/10/2018  | 4/10/2018 |               | Davis & Crump, P.C.                       |
| 0:18-cv-00078-JNE-FLN | Gottfried, Arthur v. 3M Company et al        | 1/11/2018  | 4/11/2018 |               | Davis & Crump, P.C.                       |
| 0:18-cv-00079-JNE-FLN | Burza, John v. 3M Company et al              | 1/11/2018  | 4/11/2018 |               | Davis & Crump, P.C.                       |
| 0:18-cv-00080-JNE-FLN | Harris, Jimmie Don v. 3M Company et al       | 1/11/2018  | 4/11/2018 |               | Davis & Crump, P.C.                       |
| 0:18-cv-00093-JNE-FLN | Ashley, Ruth v. 3M Company et al             | 1/12/2018  | 4/12/2018 |               | Bernstein Liebhard LLP                    |

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets  
(Updated May 11, 2018)

| Case Number           | Title                                    | Date Filed | Due Date  | Prior Listing | Firm Name                                 |
|-----------------------|--|------------|-----------|---------------|---|
| 0:18-cv-00148-JNE-FLN | Lewis, Steven et al v. 3M Company et al  | 1/22/2018  | 4/22/2018 |               | Chappell, Smith and Arden, P.A.           |
| 0:18-cv-00151-JNE-FLN | Russell, Janice v. 3M Company et al      | 1/22/2018  | 4/22/2018 |               | Bernstein Liebhard LLP                    |
| 0:18-cv-00154-JNE-FLN | Coleman, James v. 3M Company et al       | 1/22/2018  | 4/22/2018 |               | Davis & Crump, P.C.                       |
| 0:18-cv-00178-JNE-FLN | Paul, Rodney v. 3M Company et al         | 1/23/2018  | 4/23/2018 |               | Davis & Crump, P.C.                       |
| 0:18-cv-00184-JNE-FLN | Proffit, Connie v. 3M Company et al      | 1/23/2018  | 4/23/2018 |               | Davis & Crump, P.C.                       |
| 0:18-cv-00190-JNE-FLN | Lloyd, Danny v. 3M Company et al         | 1/24/2018  | 4/24/2018 |               | Davis & Crump, P.C.                       |
| 0:18-cv-00205-JNE-FLN | Shulz, Shelley v. 3M Company et al       | 1/25/2018  | 4/25/2018 |               | Bernstein Liebhard LLP                    |
| 0:18-cv-00207-JNE-FLN | Guenther, Gary v 3M Company et al        | 1/25/2018  | 4/25/2018 |               | Bernstein Liebhard LLP                    |
| 0:18-cv-00220-JNE-FLN | Brasher, Michael v. 3M Company et al     | 1/25/2018  | 4/25/2018 |               | Bernstein Liebhard LLP                    |
| 0:18-cv-00239-JNE-FLN | Hill, Tahia v. 3M Company et al          | 1/26/2018  | 4/26/2018 |               | Davis & Crump, P.C.                       |
| 0:18-cv-00249-JNE-FLN | Glasscock, Elizabeth v. 3M Company et al | 1/29/2018  | 4/29/2018 |               | DeGaris & Rogers, LLC                     |
| 0:18-cv-00257-JNE-FLN | Patrick, Marvin v. 3M Company et al      | 1/29/2018  | 4/29/2018 |               | The Law offices of Travis R. Walker, P.A. |
| 0:18-cv-00263-JNE-FLN | Robinson, Michael v. 3M Company et al    | 1/29/2018  | 4/29/2018 |               | The Law offices of Travis R. Walker, P.A. |
| 0:18-cv-00264-JNE-FLN | Wega, Salvadore v. 3M Company et al      | 1/29/2018  | 4/29/2018 |               | The Law offices of Travis R. Walker, P.A. |
| 0:18-cv-00265-JNE-FLN | Sawyer, William v. 3M Company et al      | 1/29/2018  | 4/29/2018 |               | Davis & Crump, P.C.                       |
| 0:18-cv-00274-JNE-FLN | Malone, Brenda v. 3M Company et al       | 1/30/2018  | 4/30/2018 |               | Bernstein Liebhard LLP                    |

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets  
(Updated May 11, 2018)

| Case Number           | Title                               | Date Filed | Due Date  | Prior Listing | Firm Name              |
|-----------------------|-------------------------------------|------------|-----------|---------------|------------------------|
| 0:18-cv-00275-JNE-FLN | Owens, Janis v. 3M Company et al    | 1/30/2018  | 4/30/2018 |               | Bernstein Liebhard LLP |
| 0:18-cv-00276-JNE-FLN | Travis, Joseph v. 3M Company et al  | 1/30/2018  | 4/30/2018 |               | Kirtland & Packard LLP |
| 0:18-cv-00292-JNE-FLN | Matson, Charles v. 3M Company et al | 2/1/2018   | 5/2/2018  |               | Meshbesher & Spence    |
| 0:18-cv-00318-JNE-FLN | Amador, George v. 3M Company et al  | 2/2/2018   | 5/3/2018  |               | DeGaris & Rogers, LLC  |

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated May 11, 2018)

| Case Number           | Title                                     | 1st<br>Deficiency<br>Notice<br>Sent | Response<br>Due Date | Prior Listing            | Firm Name                       |
|-----------------------|---|-------------------------------------|----------------------|--------------------------|---------------------------------|
| 0:17-cv-03496-JNE-FLN | Aker, Mary v. 3M Company et al            | 1/11/2018                           | 2/1/2018             | 03/09/2018<br>04/10/2018 | McGlynn, Glisson and Mouton     |
| 0:17-cv-04537-JNE-FLN | Echard, Audrey et al v. 3M Company et al  | 1/30/2018                           | 2/20/2018            | 03/09/2018<br>04/10/2018 | Gustafson Gluek PLLC            |
| 0:17-cv-04623-JNE-FLN | Guobadia, Maxine v. 3M Company et al      | 2/5/2018                            | 2/26/2018            | 3/9/2018                 | The Webster Law Firm            |
| 0:17-cv-04429-JNE-FLN | Holcomb, April v. 3M Company et al        | 2/7/2018                            | 2/28/2018            | 4/10/2018                | DeGaris & Rogers, LLC           |
| 0:17-cv-04716-JNE-FLN | Bewley, Kenneth v. 3M Company et al       | 3/13/2018                           | 4/3/2018             | 4/10/2018                | Kirtland and Packard LLP        |
| 0:17-cv-04896-JNE-FLN | Pew, Richard v. 3M Company et al          | 3/13/2018                           | 4/3/2018             | 4/10/2018                | Kirtland & Packard LLP          |
| 0:17-cv-04984-JNE-FLN | Cheney, Jay v. 3M Company et al           | 3/12/2018                           | 4/2/2018             | 4/10/2018                | Kirtland & Packard LLP          |
| 0:17-cv-05135-JNE-FLN | Carrell, Silas v. 3M Company et al        | 3/13/2018                           | 4/3/2018             | 4/10/2018                | Kennedy Hodges, L.L.P.          |
| 0:17-cv-05138-JNE-FLN | Johnson, Hannah v. 3M Company et al       | 3/13/2018                           | 4/3/2018             | 4/10/2018                | Kennedy Hodges, L.L.P.          |
| 0:17-cv-05140-JNE-FLN | Green, Rosemary v. 3M Company et al       | 3/13/2018                           | 4/3/2018             | 4/10/2018                | Kennedy Hodges, L.L.P.          |
| 0:17-cv-05199-JNE-FLN | Spry, John et al v. 3M Company et al      | 3/15/2018                           | 4/5/2018             | 4/10/2018                | Pendley, Baudin & Coffin L.L.P. |
| 0:17-cv-05202-JNE-FLN | Reed, Tommy et al v. 3M Company et al     | 3/19/2018                           | 4/9/2018             | 4/10/2018                | Pendley, Baudin & Coffin L.L.P. |
| 0:17-cv-04285-JNE-FLN | Nickell, Vernon et al v. 3M Company et al | 1/11/2018                           | 4/8/2018             |                          | Gustafson Gluek PLLC            |
| 0:17-cv-05083-JNE-FLN | Meredith, Benjamin v. 3M Company et al    | 4/12/2018                           | 5/3/2018             |                          | DeGaris & Rogers, LLC           |
| 0:17-cv-05200-JNE-FLN | Picuri, David v. 3M Company et al         | 3/22/2018                           | 4/12/2018            |                          | Pendley, Baudin & Coffin L.L.P. |
| 0:17-cv-05323-JNE-FLN | Richey, Priscilla v. 3M Company et al     | 4/16/2018                           | 5/7/2018             |                          | Kennedy Hodges, L.L.P.          |

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated May 11, 2018)

| 0:17-cv-05405-JNE-FLN | Perkins, Kristopher v. 3M Company et al          | 4/5/2018                   | 4/26/2018         |                       | Hausfeld LLP                    |
|-----------------------|--|----------------------------|-------------------|-----------------------|---------------------------------|
| 0:17-cv-05435-JNE-FLN | Echols, Kevin v. 3M Company et al                | 4/11/2018                  | 5/2/2018          |                       | DeGaris & Rogers, LLC           |
| Case Number           | Title  | 2nd Deficiency Notice Sent | Response Due Date | Prior Listing         | Firm Name                       |
| 0:17-cv-03747-JNE-FLN | Jackson, Deloise v. 3M Company et al             | 1/30/2018                  | 2/20/2018         | 3/9/2018<br>4/10/2018 | Schlichter Bogard & Denton, LLP |
| 0:17-cv-03848-JNE-FLN | Boughner, Roland v. 3M Company et al             | 2/5/2018                   | 2/26/2018         | 3/9/2018<br>4/10/2018 | Kennedy Hodges, L.L.P.          |
| 0:17-cv-02524-JNE-FLN | Koors, Audrey v. 3M Company et al                | 2/8/2018                   | 3/1/2018          |                       | Kennedy Hodges, L.L.P.          |
| 0:17-cv-03014-JNE-FLN | Jenkins obo Gwendolyn Jensen v. 3M Company et al | 12/29/2017                 | 1/19/2018         |                       | Kennedy Hodges, L.L.P.          |
| 0:17-cv-03616-JNE-FLN | Hoerbert, Darlene v. 3M Company et al            | 2/21/2018                  | 3/14/2018         |                       | Johnson Becker, PLLC            |
| 0:17-cv-03629-JNE-FLN | Ciccone, Louis v. 3M Company et al               | 1/17/2018                  | 2/7/2018          |                       | Kennedy Hodges, L.L.P.          |
| 0:17-cv-03899-JNE-FLN | Pimentel, Carlos v. 3M Company et al             | 2/28/2017                  | 3/21/2018         |                       | The Olinde Firm, LLC            |
| 0:17-cv-03912-JNE-FLN | Kellett, Jackson v. 3M Company et al             | 4/16/2018                  | 5/7/2018          |                       | Kennedy Hodges, L.L.P.          |
| 0:17-cv-03941-JNE-FLN | Martinez, Rodney v. 3M Company et al             | 3/8/2018                   | 3/29/2018         |                       | DeGaris & Rogers, LLC           |
| 0:17-cv-04467-JNE-FLN | Adams, Artis v. 3M Company et al                 | 4/2/2018                   | 4/23/2018         |                       | Gustafson Gluek PLLC            |
| 0:17-cv-04476-JNE-FLN | Holstine, Rachel v. 3M Company et al             | 3/29/2018                  | 4/19/2018         |                       | Bernstein Liebhard LLP          |
| 0:17-cv-04643-JNE-FLN | Pusateri, Marianne et al v. 3M Company et al     | 3/21/2018                  | 4/11/2018         |                       | The Miller Firm, LLC            |
| 0:17-cv-04703-JNE-FLN | Betts, Marilyn v. 3M Company et al               | 4/5/2018                   | 4/26/2018         |                       | Peterson & Associates, P.C.     |
| Case Number           | Title  | 3rd Deficiency Notice Sent | Response Due Date | Prior Listing         | Firm Name                       |

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated May 11, 2018)

|                       |   |           |           |                          |                         |
|-----------------------|---|-----------|-----------|--------------------------|-------------------------|
| 0:17-cv-02534-JNE-FLN | Duran, Connie v. 3M Company et al                 | 2/5/2018  | 2/26/2018 | 03/09/2018<br>04/10/2018 | Kennedy Hodges, L.L.P   |
| 0:17-cv-03022-JNE-FLN | Hoyos, Teresa v. 3M Company et al                 | 2/14/2018 | 3/7/2018  | 4/10/2018                | Brown and Crouppen, P.C |
| 0:17-cv-03464-JNE-FLN | Witt, Alan v. 3M Company et al                    | 4/5/2018  | 4/26/2018 |                          | Kennedy Hodges, L.L.P.  |
| 0:17-cv-03554-JNE-FLN | Cyr, Kevin v. 3M Company et al                    | 4/11/2018 | 5/2/2018  |                          | DeGaris & Rogers, LLC   |
| 0:17-cv-03964-JNE-FLN | Taylor, Whitney and Pat et al v. 3M Company et al | 3/27/2018 | 4/17/2018 |                          | Brent Coon & Associates |
| 0:17-cv-04169-JNE-FLN | Hurley, Jonathan v. 3M Company et al              | 4/2/2018  | 4/23/2018 |                          | The Olinde Firm, LLC    |

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Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated May 11, 2018)

| Case Number           | Title  | 3rd Deficiency Sent | Prior Listing            | Firm Name                   |
|-----------------------|--|---------------------|--------------------------|-----------------------------|
| 0:17-cv-01494-JNE-FLN | Six, John v. 3M Company et al                | 2/5/2018            | 03/09/2018<br>04/10/2018 | Hendrickson Law             |
| 0:17-cv-02638-JNE-FLN | Reinker, Susan v. 3M Company et al           | 4/4/2018            | 4/10/2018                | Kennedy Hodges, L.L.P.      |
| 0:17-cv-02901-JNE-FLN | Moore, Michael v. 3M Company et al           | 4/2/2018            | 4/10/2018                | Kennedy Hodges, L.L.P.      |
| 0:17-cv-03049-JNE-FLN | Finney, Gwendolyn v. 3M Company et al        | 3/6/2018            | 4/10/2018                | Brown and Crouppen, P.C     |
| 0:17-cv-03162-JNE-FLN | Zamora, Arturo Jr. v. 3M Company et al       | 3/8/2018            | 4/10/2018                | Brown and Crouppen, P.C     |
| 0:17-cv-03255-JNE-FLN | Holmes, Peter et al v. 3M Company et al      | 3/14/2018           | 4/10/2018                | Brown and Crouppen, P.C.    |
| 0:17-cv-03305-JNE-FLN | Brainerd, Jeremiah et al v. 3M Company et al | 2/26/2018           | 4/10/2018                | Brown and Crouppen, P.C.    |
| 0:17-cv-03533-JNE-FLN | Holcomb, Virginia v. 3M Company et al        | 3/7/2018            | 4/10/2018                | Brown and Crouppen, P.C.    |
| 0:17-cv-03662-JNE-FLN | Guyton, Sharida v. 3M Company et al          | 3/14/2018           | 4/10/2018                | Brown and Crouppen, P.C     |
| 0:17-cv-04805-JNE-FLN | Beck, Louis v. 3M Company et al              | 2/28/2017           | 4/10/2018                | Brown and Crouppen, P.C.    |
| 0:17-cv-04825-JNE-FLN | Duckworth, Laura v. 3M Company et al         | 3/9/2018            | 4/10/2018                | Brown and Crouppen, P.C.    |
| 0:17-cv-04880-JNE-FLN | Scott, Sheree v. 3M Company et al            | 2/28/2017           | 4/10/2018                | Brown and Crouppen, P.C.    |
| 0:17-cv-04892-JNE-FLN | Thyrion, Leslie v. 3M Company et al          | 3/7/2018            | 4/10/2018                | Brown and Crouppen, P.C.    |
| 0:17-cv-04934-JNE-FLN | Hall, Martha v. 3M Company et al             | 2/27/2018           | 4/10/2018                | Justinian & Associates PLLC |
| 0:17-cv-03414-JNE-FLN | Towsley, Joe v. 3M Company et al             | 4/11/2018           |                          | Sexton & Shelor             |
| 0:17-cv-03921-JNE-FLN | Benson, Robert v. 3M Company et al           | 3/29/2018           |                          | Brown and Crouppen, P.C.    |
| 0:17-cv-04041-JNE-FLN | Gibson, Lisa Karen v. 3M Company et al       | 4/2/2018            |                          | Brown and Crouppen, P.C.    |
| 0:17-cv-04230-JNE-FLN | Metivier, Gwendylen v. 3M Company et al      | 4/18/2018           |                          | Kirtland & Packard LLP      |

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Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated May 11, 2018)

| Case Number           | Title  | 3rd Deficiency Sent | Prior Listing | Firm Name            |
|-----------------------|--|---------------------|---------------|----------------------|
| 0:17-cv-04334-JNE-FLN | Zeppetella, Steven et al v. 3M Company et al | 4/9/2018            |               | Gustafson Gluek PLLC |
| 0:17-cv-04402-JNE-FLN | Weiss, Adam v. 3M Company et al              | 4/9/2018            |               | Jones Ward PLC       |

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

# **EXHIBIT D**

**Sent:** Friday, June 15, 2018 4:36 PM

**To:** 'JoanEricksen\_Chambers@mnd.uscourts.gov'; 'Noel\_Chambers@mnd.uscourts.gov'

**Cc:** Genevieve Zimmerman - Meshbesher & Spence ([gzimmerman@meshbesher.com](mailto:gzimmerman@meshbesher.com)); 'Kyle Farrar'; Gabriel Assaad ([gassaad@kennedyhodges.com](mailto:gassaad@kennedyhodges.com)); Jan Conlin ([JMC@ciresiconlin.com](mailto:JMC@ciresiconlin.com)); Ben Gordon ([bgordon@levinlaw.com](mailto:bgordon@levinlaw.com)); Jerry Blackwell; Lyn Pruitt; Mary Young; Ben Hulse; Monica L. Davies; David Szerlag; Ahmann, Bridget M. ([Bridget.Ahmann@FaegreBD.com](mailto:Bridget.Ahmann@FaegreBD.com))

**Subject:** Joint Agenda and Status Report for June 21 Status Conference (MDL No. 15-2666 (JNE/FLN))

Dear Judge Ericksen and Judge Noel,

In accordance with Pretrial Order No. 3, the parties submit this Joint Agenda and Status Conference Report in preparation for the status conference scheduled for Thursday, June 21, at 9:30 a.m. Defendants' three lists related to the Plaintiff Fact Sheets, as discussed in Section 2 of the Joint Agenda, are also attached to this email.

Best regards and have a great weekend.

Peter Goss



**Peter Goss**

Phone: 612.343.3283 | Fax: 612.343.3205

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**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated June 15, 2018)

| Case Number           | Title  | Date Filed | Due Date  | Prior Listing          | Firm Name                                 |
|-----------------------|--|------------|-----------|------------------------|---|
| 0:17-cv-05302-JNE-FLN | Kelley, Charles v. 3M Company et al          | 11/30/2017 | 2/28/2018 | 4/10/2018<br>5/11/2018 | Kirtland & Packard LLP                    |
| 0:17-cv-05469-JNE-FLN | Minnigan-Judd, Stephanie v. 3M Company et al | 12/18/2017 | 3/18/2018 | 4/10/2018<br>5/11/2018 | The Law offices of Travis R. Walker, P.A. |
| 0:17-cv-04872-JNE-FLN | Grimsley, Daniel v. 3M Company et al.        | 10/26/2017 | 1/24/2018 | 5/11/2018              | Bernstein Liebhard LLP                    |
| 0:17-cv-05581-JNE-FLN | Berzsenyi, Robert v. 3M Company et al        | 12/29/2017 | 3/29/2018 | 5/11/2018              | Law Offices of Charles H Johnson, PA      |
| 0:17-cv-05589-JNE-FLN | Bardwell, Doris v. 3M Company et al          | 12/29/2017 | 3/29/2018 | 5/11/2018              | Law Offices of Charles H Johnson, PA      |
| 0:18-cv-00078-JNE-FLN | Gottfried, Arthur v. 3M Company et al        | 1/11/2018  | 4/11/2018 | 5/11/2018              | Davis & Crump, P.C.                       |
| 0:18-cv-00080-JNE-FLN | Harris, Jimmie Don v. 3M Company et al       | 1/11/2018  | 4/11/2018 | 5/11/2018              | Davis & Crump, P.C.                       |
| 0:18-cv-00093-JNE-FLN | Ashley, Ruth v. 3M Company et al             | 1/12/2018  | 4/12/2018 | 5/11/2018              | Bernstein Liebhard LLP                    |
| 0:18-cv-00151-JNE-FLN | Russell, Janice v. 3M Company et al          | 1/22/2018  | 4/22/2018 | 5/11/2018              | Bernstein Liebhard LLP                    |
| 0:18-cv-00154-JNE-FLN | Coleman, James v. 3M Company et al           | 1/22/2018  | 4/22/2018 | 5/11/2018              | Davis & Crump, P.C.                       |
| 0:18-cv-00184-JNE-FLN | Proffit, Connie v. 3M Company et al          | 1/23/2018  | 4/23/2018 | 5/11/2018              | Davis & Crump, P.C.                       |
| 0:18-cv-00205-JNE-FLN | Shulz, Shelley v. 3M Company et al           | 1/25/2018  | 4/25/2018 | 5/11/2018              | Bernstein Liebhard LLP                    |
| 0:18-cv-00207-JNE-FLN | Guenther, Gary v 3M Company et al            | 1/25/2018  | 4/25/2018 | 5/11/2018              | Bernstein Liebhard LLP                    |
| 0:18-cv-00220-JNE-FLN | Brasher, Michael v. 3M Company et al         | 1/25/2018  | 4/25/2018 | 5/11/2018              | Bernstein Liebhard LLP                    |
| 0:18-cv-00257-JNE-FLN | Patrick, Marvin v. 3M Company et al          | 1/29/2018  | 4/29/2018 | 5/11/2018              | The Law offices of Travis R. Walker, P.A. |
| 0:18-cv-00263-JNE-FLN | Robinson, Michael v. 3M Company et al        | 1/29/2018  | 4/29/2018 | 5/11/2018              | The Law offices of Travis R. Walker, P.A. |
| 0:18-cv-00265-JNE-FLN | Sawyer, William v. 3M Company et al          | 1/29/2018  | 4/29/2018 | 5/11/2018              | Davis & Crump, P.C.                       |
| 0:18-cv-00274-JNE-FLN | Malone, Brenda v. 3M Company et al           | 1/30/2018  | 4/30/2018 | 5/11/2018              | Bernstein Liebhard LLP                    |
| 0:18-cv-00275-JNE-FLN | Owens, Janis v. 3M Company et al             | 1/30/2018  | 4/30/2018 | 5/11/2018              | Bernstein Liebhard LLP                    |
| 0:18-cv-00348-JNE-FLN | Smith, Dorothy v. 3M Company et al           | 2/7/2018   | 5/8/2018  |                        | The Miller Firm, LLC                      |
| 0:18-cv-00354-JNE-FLN | McDermott, Kevin et al v. 3M Company et al   | 2/8/2018   | 5/9/2018  |                        | Parker Waichman LLP                       |
| 0:18-cv-00437-JNE-FLN | McCullough, Angie v. 3M Company et al        | 2/14/2018  | 5/15/2018 |                        | Davis & Crump, P.C.                       |
| 0:18-cv-00444-JNE-FLN | Garrison, Steven v. 3M Company et al         | 2/15/2018  | 5/16/2018 |                        | Davis & Crump, P.C.                       |
| 0:18-cv-00527-JNE-FLN | Morgan, Evelyn v. 3M Company et al           | 2/23/2018  | 5/24/2018 |                        | Davis & Crump, P.C.                       |
| 0:18-cv-00529-JNE-FLN | Logsdon, Wanda v. 3M Company et al           | 2/23/2018  | 5/24/2018 |                        | Davis & Crump, P.C.                       |
| 0:18-cv-00606-JNE-FLN | Jones, Karen Marie v. 3M Company et al       | 3/2/2018   | 5/31/2018 |                        | Davis & Crump, P.C.                       |
| 0:18-cv-00609-JNE-FLN | Larrison, Terry v. 3M Company et al          | 3/2/2018   | 5/31/2018 |                        | Davis & Crump, P.C.                       |

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Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated June 15, 2018)

| Case Number           | Title                              | Date Filed | Due Date  | Prior Listing | Firm Name                       |
|-----------------------|------------------------------------|------------|-----------|---------------|---------------------------------|
| 0:18-cv-00617-JNE-FLN | Hayes, Carol v. 3M Company et al   | 3/2/2018   | 5/31/2018 |               | Schlichter Bogard & Denton, LLP |
| 0:18-cv-00641-JNE-FLN | Rhew, Barbara v. 3M Company et al  | 3/7/2018   | 6/5/2018  |               | Morris Law Firm                 |
| 0:18-cv-00681-JNE-FLN | Ferrer, Gladys v. 3M Company et al | 3/9/2018   | 6/7/2018  |               | Morris Law Firm                 |

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**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated June 15, 2018)

| Case Number           | Title  | 1st<br>Deficiency<br>Notice<br>Sent | Response<br>Due Date | Prior Listing           | Firm Name                       |
|-----------------------|--|-------------------------------------|----------------------|-------------------------|---------------------------------|
| 0:17-cv-04429-JNE-FLN | Holcomb, April v. 3M Company et al             | 12/26/2017                          | 2/28/2018            | 4/10/2018<br>05/11/2018 | DeGaris & Rogers, LLC           |
| 0:17-cv-04896-JNE-FLN | Pew, Richard v. 3M Company et al               | 1/24/2018                           | 4/3/2018             | 4/10/2018<br>05/11/2018 | Kirtland & Packard LLP          |
| 0:17-cv-04984-JNE-FLN | Cheney, Jay v. 3M Company et al                | 1/30/2018                           | 4/2/2018             | 4/10/2018<br>05/11/2018 | Kirtland & Packard LLP          |
| 0:17-cv-05199-JNE-FLN | Spry, John et al v. 3M Company et al           | 2/19/2018                           | 4/5/2018             | 4/10/2018<br>05/11/2018 | Pendley, Baudin & Coffin L.L.P. |
| 0:17-cv-05202-JNE-FLN | Reed, Tommy et al v. 3M Company et al          | 3/19/2018                           | 4/9/2018             | 4/10/2018<br>05/11/2018 | Pendley, Baudin & Coffin L.L.P. |
| 0:17-cv-04285-JNE-FLN | Nickell, Vernon et al v. 3M Company et al      | 1/11/2018                           | 4/8/2018             | 5/11/2018               | Gustafson Gluek PLLC            |
| 0:17-cv-05083-JNE-FLN | Meredith, Benjamin v. 3M Company et al         | 4/12/2018                           | 5/3/2018             | 5/11/2018               | DeGaris & Rogers, LLC           |
| 0:17-cv-05200-JNE-FLN | Picuri, David v. 3M Company et al              | 3/22/2018                           | 4/12/2018            | 5/11/2018               | Pendley, Baudin & Coffin L.L.P. |
| 0:17-cv-05323-JNE-FLN | Richey, Priscilla v. 3M Company et al          | 4/16/2018                           | 5/7/2018             | 5/11/2018               | Kennedy Hodges, L.L.P.          |
| 0:17-cv-04778-JNE-FLN | Brown, Ina v. 3M Company et al.                | 4/17/2018                           | 5/8/2018             |                         | Bernstein Liebhard LLP          |
| 0:17-cv-04881-JNE-FLN | Potter, Karen v. 3M Company et al              | 5/7/2018                            | 5/28/2018            |                         | Bernstein Liebhard LLP          |
| 0:17-cv-04885-JNE-FLN | McEvoy, Mark v. 3M Company et al               | 5/7/2018                            | 5/28/2018            |                         | Bernstein Liebhard LLP          |
| 0:17-cv-04889-JNE-FLN | Thornton, Mildred v. 3M Company et al          | 5/7/2018                            | 5/28/2018            |                         | Bernstein Liebhard LLP          |
| 0:17-cv-04891-JNE-FLN | Edwards, Renate v. 3M Company et al            | 4/17/2018                           | 5/8/2018             |                         | Bernstein Liebhard LLP          |
| 0:17-cv-05123-JNE-FLN | Robinson-Bessicks, Alberta v. 3M Company et al | 5/10/2018                           | 5/31/2018            |                         | Kirtland and Packard LLP        |
| 0:17-cv-05261-JNE-FLN | Hardy, Alan v. 3M Company et al                | 4/17/2018                           | 5/8/2018             |                         | Bernstein Liebhard LLP          |
| 0:17-cv-05270-JNE-FLN | Johnston, Todd v. 3M Company et al             | 4/17/2018                           | 5/8/2018             |                         | Bernstein Liebhard LLP          |
| 0:17-cv-05277-JNE-FLN | Billings, Willard v. 3M Company et al          | 4/17/2018                           | 5/8/2018             |                         | Bernstein Liebhard LLP          |
| 0:17-cv-05345-JNE-FLN | Lacy, John v. 3M Company et al                 | 5/8/2018                            | 5/29/2018            |                         | Davis & Crump, P.C.             |

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**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated June 15, 2018)

| Case Number           | Title  | 2nd<br>Deficiency<br>Notice<br>Sent | Response<br>Due Date | Prior Listing | Firm Name              |
|-----------------------|--|-------------------------------------|----------------------|---------------|------------------------|
| 0:17-cv-05370-JNE-FLN | Taplin, Janice v. 3M Company et al               | 5/7/2018                            | 5/28/2018            |               | Bernstein Liebhard LLP |
| 0:17-cv-05371-JNE-FLN | Bresnock, Anne v. 3M Company et al               | 5/7/2018                            | 5/28/2018            |               | Bernstein Liebhard LLP |
| 0:17-cv-05385-JNE-FLN | Jackson, Janice v. 3M Company et al              | 5/7/2018                            | 5/28/2018            |               | Davis & Crump, P.C.    |
| 0:17-cv-05466-JNE-FLN | Adams, Laurel v. 3M Company et al                | 5/7/2018                            | 5/28/2018            |               | Davis & Crump, P.C.    |
| 0:17-cv-05472-JNE-FLN | Jones, Denise v. 3M Company et al                | 5/17/2018                           | 6/7/2018             |               | Johnson Becker, PLLC   |
| 0:18-cv-00045-JNE-FLN | Swales, Bertha v. 3M Company et al               | 5/7/2018                            | 5/28/2018            |               | Bernstein Liebhard LLP |
| 0:18-cv-00064-JNE-FLN | Garvin, Leah v. 3M Company et al                 | 5/17/2018                           | 6/7/2018             |               | Johnson Becker, PLLC   |
| 0:17-cv-02524-JNE-FLN | Koors, Audrey v. 3M Company et al                | 2/8/2018                            | 03/01/2018           | 5/11/2018     | Kennedy Hodges, L.L.P. |
| 0:17-cv-03014-JNE-FLN | Jenkins obo Gwendolyn Jensen v. 3M Company et al | 12/29/2017                          | 1/19/2018            | 5/11/2018     | Kennedy Hodges, L.L.P. |
| 0:17-cv-03616-JNE-FLN | Hoerbert, Darlene v. 3M Company et al            | 2/21/2018                           | 03/14/2018           | 5/11/2018     | Johnson Becker, PLLC   |
| 0:17-cv-03629-JNE-FLN | Ciccone, Louis v. 3M Company et al               | 1/17/2018                           | 02/07/2018           | 5/11/2018     | Kennedy Hodges, L.L.P. |
| 0:17-cv-03899-JNE-FLN | Pimentel, Carlos v. 3M Company et al             | 2/28/2017                           | 03/21/2018           | 5/11/2018     | The Olinde Firm, LLC   |
| 0:17-cv-03912-JNE-FLN | Kellett, Jackson v. 3M Company et al             | 4/16/2018                           | 5/7/2018             | 5/11/2018     | Kennedy Hodges, L.L.P. |
| 0:17-cv-04467-JNE-FLN | Adams, Artis v. 3M Company et al                 | 4/2/2018                            | 4/23/2018            | 5/11/2018     | Gustafson Gluek PLLC   |
| 0:17-cv-04476-JNE-FLN | Holstine, Rachel v. 3M Company et al             | 3/29/2018                           | 4/19/2018            | 5/11/2018     | Bernstein Liebhard LLP |
| 0:17-cv-04257-JNE-FLN | Coggins, Mark v. 3M Company et al                | 4/27/2018                           | 05/18/2018           |               | Kennedy Hodges, LLP    |
| 0:17-cv-04470-JNE-FLN | Ingram, Virginia v. 3M Company et al             | 5/7/2018                            | 05/28/2018           |               | Bernstein Liebhard LLP |
| 0:17-cv-04517-JNE-FLN | Henderson, Stephanie v. 3M Company et al         | 5/7/2018                            | 05/28/2018           |               | Bernstein Liebhard LLP |

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**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated June 15, 2018)

| 0:17-cv-04672-JNE-FLN | Bassett, Carey v. 3M Company et al       | 3/28/2018                  | 4/18/2018         |                         | Schlchter Bogard & Denton, LLP        |
|-----------------------|--|----------------------------|-------------------|-------------------------|---------------------------------------|
| 0:17-cv-04752-JNE-FLN | Hyer, David v. 3M Company et al          | 5/4/2018                   | 05/25/2018        |                         | Gustafson Gluek PLLC                  |
| 0:17-cv-04777-JNE-FLN | Pine, Randy v. 3M Company et al.         | 5/7/2018                   | 5/28/2018         |                         | Bernstein Liebhard LLP                |
| 0:17-cv-04779-JNE-FLN | Key, Nancy v. 3M Company et al           | 4/27/2018                  | 5/18/2018         |                         | Kennedy Hodges, L.L.P.                |
| 0:17-cv-05231-JNE-FLN | Williams, Catherine v. 3M Company et al  | 5/8/2018                   | 05/29/2018        |                         | Davis & Crump, P.C.                   |
| Case Number           | Title                                    | 3rd Deficiency Notice Sent | Response Due Date | Prior Listing           | Firm Name                             |
| 0:17-cv-03022-JNE-FLN | Hoyos, Teresa v. 3M Company et al        | 2/14/2018                  | 3/7/2018          | 5/11/2018<br>04/10/2018 | Brown and Crouppen, P.C               |
| 0:17-cv-03464-JNE-FLN | Witt, Alan v. 3M Company et al           | 4/5/2018                   | 4/26/2018         | 5/11/2018               | Kennedy Hodges, L.L.P.                |
| 0:17-cv-04169-JNE-FLN | Hurley, Jonathan v. 3M Company et al     | 4/2/2018                   | 4/23/2018         | 5/11/2018               | The Olinde Firm, LLC                  |
| 0:17-cv-03252-JNE-FLN | Gorbett, Jamie v. 3M Company et al       | 5/7/2018                   | 5/18/2018         |                         | Bernstein Liebhard LLP                |
| 0:17-cv-03573-JNE-FLN | Parker, Lloyd v. 3M Company et al        | 5/7/2018                   | 5/18/2018         |                         | Bernstein Liebhard LLP                |
| 0:17-cv-03696-JNE-FLN | Hickman, Alan v. 3M Company et al        | 4/27/2018                  | 5/18/2018         |                         | Kennedy Hodges, L.L.P.                |
| 0:17-cv-03851-JNE-FLN | Colby, Mary v. 3M Company et al          | 5/3/2018                   | 5/18/2018         |                         | Kennedy Hodges, L.L.P.                |
| 0:17-cv-04009-JNE-FLN | Rude, Lynas v. 3M Company et al          | 5/7/2018                   | 5/18/2018         |                         | Bernstein Liebhard LLP                |
| 0:17-cv-04502-JNE-FLN | Parker, Iris v. 3M Company et al         | 5/4/2018                   | 5/18/2018         |                         | Andrews Thornton Higgins Razmara, LLP |
| 0:17-cv-04678-JNE-FLN | Bacon, Robert, et al v. 3M Company et al | 5/17/2018                  | 5/18/2018         |                         | Schlchter Bogard & Denton, LLP        |

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**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated June 15, 2018)

| Case Number           | Title  | 3rd Deficiency Sent | Prior Listing           | Firm Name                  |
|-----------------------|--|---------------------|-------------------------|----------------------------|
| 0:17-cv-02638-JNE-FLN | Reinker, Susan v. 3M Company et al           | 2/6/2018            | 4/10/2018<br>05/11/2018 | Kennedy Hodges, L.L.P.     |
| 0:17-cv-02901-JNE-FLN | Moore, Michael v. 3M Company et al           | 2/14/2018           | 4/10/2018<br>05/11/2018 | Kennedy Hodges, L.L.P.     |
| 0:17-cv-03049-JNE-FLN | Finney, Gwendolyn v. 3M Company et al        | 2/14/2018           | 4/10/2018<br>05/11/2018 | Brown and Crouppen, P.C    |
| 0:17-cv-03255-JNE-FLN | Holmes, Peter et al v. 3M Company et al      | 2/21/2018           | 4/10/2018<br>05/11/2018 | Brown and Crouppen, P.C    |
| 0:17-cv-03662-JNE-FLN | Guyton, Sharida v. 3M Company et al          | 2/21/2018           | 4/10/2018<br>05/11/2018 | Brown and Crouppen, P.C    |
| 0:17-cv-04805-JNE-FLN | Beck, Louis v. 3M Company et al              | 2/28/2017           | 4/10/2018<br>05/11/2018 | Brown and Crouppen, P.C    |
| 0:17-cv-04825-JNE-FLN | Duckworth, Laura v. 3M Company et al         | 2/20/2018           | 4/10/2018<br>05/11/2018 | Brown and Crouppen, P.C    |
| 0:17-cv-04880-JNE-FLN | Scott, Sheree v. 3M Company et al            | 2/28/2017           | 4/10/2018<br>05/11/2018 | Brown and Crouppen, P.C    |
| 0:17-cv-04892-JNE-FLN | Thyrlion, Leslie v. 3M Company et al         | 3/7/2018            | 4/10/2018<br>05/11/2018 | Brown and Crouppen, P.C    |
| 0:17-cv-03305-JNE-FLN | Brainerd, Jeremiah et al v. 3M Company et al | 2/26/2018           | 4/10/2018<br>05/11/2018 | Brown and Crouppen, P.C.   |
| 0:17-cv-03414-JNE-FLN | Towsley, Joe v. 3M Company et al             | 4/11/2018           | 5/11/2011               | Sexton & Shelor            |
| 0:17-cv-04041-JNE-FLN | Gibson, Lisa Karen v. 3M Company et al       | 4/2/2018            | 5/11/2011               | Brown and Crouppen, P.C.   |
| 0:17-cv-04334-JNE-FLN | Zeppetella, Steven et al v. 3M Company et al | 4/9/2018            | 5/11/2011               | Gustafson Gluek PLLC       |
| 0:17-cv-04402-JNE-FLN | Weiss, Adam v. 3M Company et al              | 4/9/2018            | 5/11/2011               | Jones Ward PLC             |
| 0:16-cv-00787-JNE-FLN | Abrams v. 3M Company et al                   | 4/19/2017           |                         | Thering & Associates, PLLC |
| 0:16-cv-03618-JNE-FLN | Messner-Katzer v. 3M Company et al           | 5/16/2017           |                         | Capretz & Associates       |
| 0:17-cv-02925-JNE-FLN | Zimmerman, Burl v. 3M Company et al          | 4/24/2018           |                         | The Olinde Firm, LLC       |
| 0:17-cv-03413-JNE-FLN | Williams, Wanda v. 3M Company, et al         | 4/12/2018           |                         | Sexton & Shelor            |
| 0:17-cv-03501-JNE-FLN | Smith, Carla v. 3M Company et al             | 5/2/2018            |                         | Kennedy Hodges, L.L.P.     |

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**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
 (Updated June 15, 2018)

| Case Number           | Title                                      | 3rd Deficiency Sent | Prior Listing | Firm Name  |
|-----------------------|--|---------------------|---------------|--|
| 0:17-cv-03541-JNE-FLN | Chille, Annette v. 3M Company et al        | 4/24/2018           |               | Kennedy Hodges, L.L.P.                                       |
| 0:17-cv-03554-JNE-FLN | Cyr, Kevin v. 3M Company et al             | 4/11/2018           |               | DeGaris & Rogers, LLC  |
| 0:17-cv-03563-JNE-FLN | Opperman, Charlene v. 3M Company et al     | 5/2/2018            |               | Kennedy Hodges, L.L.P.                                       |
| 0:17-cv-03718-JNE-FLN | Seymore, Mary v. 3M Company et al          | 4/27/2018           |               | Kennedy Hodges, L.L.P.                                       |
| 0:17-cv-03952-JNE-FLN | Pratt, Debra et al v. 3M Company et al     | 4/25/2018           |               | Brent Coon & Associates                                      |
| 0:17-cv-03963-JNE-FLN | Jones, Rose v. 3M Company et al            | 5/21/2018           |               | Kennedy Hodges, L.L.P.                                       |
| 0:17-cv-04298-JNE-FLN | Colby, Charles Gilbert v. 3M Company et al | 5/17/2018           |               | Charles Gilbert Colby <i>pro se</i>                          |
| 0:17-cv-04327-JNE-FLN | Robertson, Jeffrey v. 3M Company et al     | 4/24/2018           |               | Randall J. Trost, P.C.                                       |
| 0:17-cv-04328-JNE-FLN | Robertson, Jeffrey v. 3M Company et al     | 4/24/2018           |               | Randall J. Trost, P.C.                                       |
| 0:17-cv-04331-JNE-FLN | Israel, Marc v. 3M Company et al           | 4/25/2018           |               | Schlichter, Bogard & Denton, LLP                             |
| 0:17-cv-04385-JNE-FLN | Erdman, Elmer v. 3M Company et al          | 4/18/2018           |               | Brown & Crouppen, PC   |
| 0:17-cv-04389-JNE-FLN | Miller, Amanda v. 3M Company et al         | 5/10/2018           |               | Jones Ward PLC   |
| 0:17-cv-04400-JNE-FLN | Duckworth, Timothy v. 3M Company et al     | 5/8/2018            |               | Jones Ward PLC   |
| 0:17-cv-04433-JNE-FLN | Greene, James v. 3M Company                | 4/25/2018           |               | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A |
| 0:17-cv-04518-JNE-FLN | Robertson, Douglas v. 3M Company et al     | 4/25/2018           |               | Meshbesher & Spence, LTD                                     |
| 0:17-cv-04609-JNE-FLN | Holden, Dianna v. 3M Company et al         | 5/2/2018            |               | The Webster Law Firm   |
| 0:17-cv-04612-JNE-FLN | Giroir, Shirley et al v. 3M Company et al  | 5/2/2018            |               | The Webster Law Firm   |
| Case Number           | Title                                      | 3rd Deficiency Sent | Prior Listing | Firm Name  |

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**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated June 15, 2018)

|                       |   |           |  |                          |
|-----------------------|---|-----------|--|--------------------------|
| 0:17-cv-04631-JNE-FLN | Lewis, Donald v. 3M Company et al       | 5/2/2018  |  | The Webster Law Firm     |
| 0:17-cv-04639-JNE-FLN | Guess, Carl v. 3M Company et al         | 5/7/2018  |  | The Webster Law Firm     |
| 0:17-cv-04654-JNE-FLN | Keith, Kody v. 3M Company et al         | 5/9/2018  |  | Brown and Crouppen, P.C. |
| 0:17-cv-04677-JNE-FLN | Resendez, Esperanza v. 3M Company et al | 5/9/2018  |  | Brown and Crouppen, P.C. |
| 0:17-cv-04845-JNE-FLN | Murray, Dan v. 3M Company et al         | 5/17/2018 |  | Kirtland and Packard LLP |
| 0:17-cv-04859-JNE-FLN | Bradford, Darryl v. 3M Company et al    | 4/25/2018 |  | The Miller Firm, LLC     |

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